## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

In Re:

: Case No. 14-54951

Robyn A. Williams

Debtor : Chapter 13 : Judge Preston

## MOTION TO WITHDRAW AS COUNSEL

Now comes James E. Nobile and his law firm of Nobile and Thompson Co., L.P.A., attorney for Debtor, Robyn Williams, who moves this Court for an Order allowing him and his firm to withdraw as counsel in this matter.

/s/ James E. Nobile

James E. Nobile (0059705)

Nobile & Thompson Co., L.P.A.
4876 Cemetery Road
Hilliard, Ohio 43026
614-529-8600

614-529-8656 Fax jenobile@ntlegal.com

MEMORANDUM IN SUPPORT

Debtor, Robyn Williams, filed a Chapter 13 bankruptcy petition on July 11, 2014. The

Debtor has been contacted numerous times via US Mail and telephone asking for contact

regarding an automobile accident and insurance on the vehicle. No response has been received

from the Debtor. The Debtor was given a deadline of March 31, 2016 to contact the office in a

letter mailed March 16, 2016. No contact has been made by the Debtor with Counsel or his

office.

Wherefore, based upon the foregoing, Counsel believe that good cause exists to warrant

the issuance of an Order allowing them to withdraw from the case, and from further

representation of the Debtor.

Respectfully submitted,

/s/ James E. Nobile

James E. Nobile (0059705)

Nobile & Thompson Co., L.P.A.

## **CERTIFICATE OF SERVICE**

I hereby certify that on April 11, 2016, a true copy of the foregoing Motion to Withdraw as Counsel and attached Form 20A was served upon the following registered ECF participants, **electronically** through the court's ECF System at the email address registered with the court: The Chapter 13 Trustee and The Office of the U.S. Trustee and on the following by **ordinary U.S. Mail, postage pre-paid,** addressed to:

Robyn Williams 7565 Creekbend Dr. Pickerington OH 43147

/s/ James E. Nobile
James E. Nobile (0059705)

Nobile & Thompson Co., L.P.A.
4876 Cemetery Road
Hilliard, Ohio 43026
614-529-8600
614-529-8656 Fax
jenobile@ntlegal.com

## Form 20A NOTICE OF MOTION

The Debtor(s) has/have filed papers with this Court requesting the relief sought in the Motion enclosed with this NOTICE.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to GRANT the relief requested in the enclosed MOTION, or if you want the Court to consider your views on the MOTION, then on or before **21 DAYS FROM THE DATE SET FORTH IN THE CERTIFICATE OF SERVICE OF THIS MOTION**, you or your attorney must:

- 1. File with the Court, a written response to the MOTION expressing your objection or viewpoint. The response is to be filed with the Clerk of Courts at 170 N. High St. Columbus, Ohio 43215.
  - If you mail your written response to the Court for filing by the Clerk, you must mail it early enough so the Court will **receive** it on or before the date stated above.
- 2. You must also mail a copy of the written response to the Debtor(s) at the address listed on the front of this paper entitled Certificate of Service.
- 3. You must also mail a copy of the written response to **Nobile & Thompson Co., L.P.A., 4876 Cemetery Road, Hilliard, Ohio 43026.**
- 4. Finally, you must attend any Court hearing scheduled to consider this MOTION. The Court will likely schedule an oral hearing and serve only those parties who have in fact filed a written response.